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Accepted / Filed PAGE 01/02

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Sept. 17, 2016

Marlene Dortch, Secretary Federal Communications Commission Office of the Secretary 445 12th Street S.W. Washington, D.C. 20554

Re:

Docket No. 15-94

Comments in Support of Gorman-Redlich's Request for Limited Waiver

Dear Ms. Dortch:

My name is _______, and I am the [insert title, such as owner/Chief Engineer/President] of Radio Station [insert call sign], licensed to [insert city of license], (insert state of license). We are located in a small market, and we have a small operation with few employees. We are not an LP-1 or LP-2 station, and to our knowledge there are no other broadcast stations that rely on our station for the daisy-chain operation of the EAS. I am submitting this filing in support of the waiver request filed by Mr. James T. Gorman of Gorman-Redlich Mfg. Co. Station [insert call sign] currently uses legacy EAS equipment, which is compliant with the EAS rules except that it has not been upgraded for the six zeroes (000000) national location code.

As Mr. Gorman described in his Waiver Request (a copy of which is attached to these comments), we have kept our legacy equipment in service because it continues to function as designed and performs to the specifications to which it was designed under Part 11 of the Commission's rules, and replacing this equipment would require a substantial monetary outlay for us. In connection with our legacy EAS box, we have previously installed an intermediary device in order to meet the FCC's CAP requirements.

Mr. Gorman has proposed that stations like ours be permitted to modify the operation of the intermediary device as follows:

Allow for the insertion of the "ENTIRE STATE" location code (0XX000) for the station's state of installation into the generated EAS header code for messages received by the CAP intermediary device and which are addressed to the "ENTIRE UNITED STATES" location code (000000).

As we understand it, the proposed modification would allow our "legacy" EAS equipment to respond to the nationwide message. We ask that you grant Mr. Gorman's petition to give us this necessary flexibility. Thank you.

Sincerely,